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MEMORANDUM FOR:	Associate Deputy Director for Administration	
FROM:	Chief, Safety Staff, DDA	25X1
SUBJECT:	Safety Staff - Organizational Placement	
REFERENCE:	Memo for the Record signed by dated 11 August 1983, Subject: Management Staff Activities	25X1

- 1. In accordance with your request, the following comments are submitted pertaining to paragraph 3 of the reference memorandum:
  - a. First and foremost, the individuals making the recommendation regarding the organizational placement of the Safety Staff are totally lacking in their knowledge of the safety profession and, why such a subject would even be considered by them is questionable to say the least.
  - b. Locating the Safety Staff in the Office of Medical Services would be inappropriate and a step backward. The majority of work performed by safety personnel is in no way related to Preventive Medicine or to other activities within the OMS.
  - c. Many audits and evaluations have been made over the years by recognized authorities in the field of safety and fire protection, both internal and external. These authorities have given considerable thought and prepared exhaustive reports regarding the Agency's Safety Program and in each and every instance, the recommendations have been basically the same, i.e., to position the Safety Staff directly under the DDA. In one instance, it was recommended that the Safety Staff be placed under the DCI.
  - d. The Department of Labor in its audits of 1974 and 1977 stressed the importance of having the Safety Staff report directly and exclusively to the DDA.

e. The Agency in 1979 paid in excess of to the International Loss Control Institute to evaluate the Safety Program. Their recommendation was to have the Safety Staff report to the DCI and no lower than the DDA.	25X1
f. The IG Report of 1981, in reviewing the reports mentioned in d and e above as well as others, recommended the transfer of the Safety Group from the Office of Security to an appropriate position within the DA where it would have the visibility and influence needed to carry out an effective program.	
3. There is no doubt in my mind regarding Recommendation #22 of the IG Report of 1981 and the intent of this recommendation to give the Safety Program more clout. I also feel the Agency could be subjected to severe criticism by the Department of Labor. In a letter dated 24 March 1983, we advised the Secretary of Labor that the Safety Staff, in accordance with his recommendations of the past, was transferred from the Office of Security to the Office of the DDA. We have also rewritten Agency Safety Regulations (dated 8 September 1983), to reflect this change.	25X1
4. The Safety Program today is working better than at any time in its history. I feel we have more clout; we have more personnel; and funds are available for both travel and correcting deficiencies. The placement of the Safety Program within the Office of Medical Services as mentioned previously would be one giant step backward and again I feel would violate both the spirit and intent of the IG Recommendation. If anything, consideration should be given to positioning the Safety Program in the Office of the Director.	
	25X1